

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

CITY OF HOLLYWOOD FIREFIGHTERS’
PENSION FUND, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

UNITEDHEALTH GROUP INC., ANDREW
WITTY, STEPHEN HEMSLEY, and BRIAN
THOMPSON,

Defendants.

Case No. 0:24-cv-01743

CLASS ACTION

**JOINT STIPULATION REGARDING SERVICE AND
DEFENDANTS’ TIME TO RESPOND TO THE COMPLAINT**

Plaintiff City of Hollywood Firefighters’ Pension Fund (“Plaintiff”) and Defendants UnitedHealth Group Inc., Andrew Witty, Stephen Hemsley, and Brian Thompson (“Defendants,” and together with the Plaintiff, the “Parties”), by and through their undersigned counsel, hereby jointly stipulate and agree as follows:

1. WHEREAS, on May 14, 2024, Plaintiff filed a putative class action complaint against Defendants in the above-captioned action, alleging violations of Sections 10(b) and 20(a) of the Exchange Act of 1934 (the “Exchange Act”) and Rule 10b-5, promulgated thereunder (the “Complaint”);

2. WHEREAS, the undersigned counsel for Defendants has been authorized and hereby accepts service of the Complaint on behalf of Defendants;

3. WHEREAS, this action is governed by the Private Securities Litigation Act of 1995 (the “PSLRA”), 15 U.S.C. § 78u-4 *et seq.*, which, among other things, provides for a specific

process for the publication of notice of the pendency of the action as well as for the appointment of lead plaintiff and lead counsel to represent the putative class;

4. WHEREAS, Plaintiff's counsel represents that pursuant to the PSLRA, 15 U.S.C. § 78u-4(a)(3)(A)(i), on May 14, 2024, Plaintiff's counsel published notice alerting investors to the pendency of the above-captioned action and the July 15, 2024, deadline for seeking appointment as lead plaintiff;

5. WHEREAS, pursuant to the PSLRA, the Court will appoint as lead plaintiff the person or group of persons who are members of the proposed class that the Court determines to be "most capable of adequately representing the interests of class members," 15 U.S.C. § 78u-4(a)(3)(B)(i)-(ii);

6. WHEREAS, once the lead plaintiff and lead counsel are appointed, an operative complaint will be identified, or an amended or consolidated complaint will be filed, which will become the operative complaint; and

7. WHEREAS, the Parties agree that in the interests of judicial economy, conservation of time and resources, and orderly management of this action, Defendants should not respond to the Complaint until after (i) a lead plaintiff and lead counsel are appointed by the Court pursuant to the PSLRA, and (ii) lead plaintiff identifies or files an operative complaint in this action.

IT IS HEREBY STIPULATED AND AGREED, by and between the Parties through the undersigned counsel, subject to the Court's approval, as follows:

1. The undersigned counsel for Defendants accept service of the Complaint. By agreeing to accept service of the Complaint, Defendants do not waive any rights, defenses, or arguments, all of which are hereby preserved, with the sole exception of arguments based on insufficient service of process.

2. No Defendant has any obligation to answer or otherwise respond to the Complaint until after the Court appoints a lead plaintiff and lead counsel and the lead plaintiff identifies or files an operative complaint.

3. Within fourteen (14) days of the entry of an order appointing lead plaintiff and lead counsel, lead counsel and counsel for Defendants shall submit to the Court a proposed schedule for the designation or filing of an operative complaint and for briefing on any motion to dismiss or response thereto.

Dated: June 5, 2024

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

/s/ Gregg M. Fishbein

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